

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	
	:	
MICHELLE MAY	:	CHAPTER 13
	:	
xxx-xx-3066	:	CASE NO. 24-14125
	:	
Debtor.	:	
	:	Judge: AMC
LEGACY MORTGAGE ASSET TRUST	:	
2018-RPL2	:	
Movant,	:	
v.	:	
	:	
MICHELLE MAY	:	
	:	
Debtor,	:	
And	:	
	:	
SCOTT F. WATERMAN	:	
	:	
Trustee.	:	
	:	
Respondents.	:	
	:	

**OBJECTION TO CONFIRMATION OF PLAN PURSUANT TO 11 U.S.C. SECTION
1322, 1324, AND 1325, *ET SEQ.***

Secured Creditor, Legacy Mortgage Asset Trust 2018-RPL2, the holder of a mortgage on the real property of the Debtor commonly known as 39 Granite Hill Lane, Glenmoore, Pennsylvania 19343-1723, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan proposed by the Debtor. Secured Creditor's claim is a total debt claim. The loan matures on February 1, 2026, so the total claim must be paid through the Debtor's Plan.

Further, objection is made to confirmation of the proposed Plan in the event that:

- (a) the Debtor has failed to make all required payments to the Standing Trustee pursuant to 11 U.S.C. Section 1326;
- (b) the Debtor seeks to modify the rights of Secured Creditor, which is the holder of a claim secured only by a security interest in real property that is the principal residence of the Debtor;
- (c) the proposed plan fails to comply with the requirements of the Bankruptcy Code and is not proposed in good faith;
- (d) the proposed plan does not provide that Secured Creditor retain its lien;
- (e) the value of the property to be distributed to Secured Creditor under the plan is less than the allowed amount of its claim;
- (f) the proposed plan is not feasible;
- (g) the proposed plan fails to comply with other applicable provisions of Title 11;
- (h) the proposed plan fails to provide for Secured Creditor's claim as provided for in its Proof of Claim.

Wherefore, Secured Creditor respectfully requests that the Court deny confirmation of Debtor's proposed Plan.

Respectfully submitted,
Romano Garubo & Argentieri

/s/EMMANUEL J. ARGENTIERI
EMMANUEL J. ARGENTIERI

Date: February 27, 2025

ROMANO GARUBO & ARGENTIERI
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	:	
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	:	
Respondents.	:	
	:	
	:	

CERTIFICATION OF SERVICE

1. I, Kristina S. Johnston:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Romano Garubo & Argentieri, who represents the secured creditor, Legacy Mortgage Asset Trust 2018-RPL2, in the above-captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On February 27, 2025, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.

Objection to Confirmation of Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: February 27, 2025

/s/ KRISTINA S. JOHNSTON
KRISTINA S. JOHNSTON

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Michelle May 39 Granite Hill Lane Glenmoore, PA 19343	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Michael A. Cibik Cibik Law, P.C. 1500 Walnut Street Suite 900 Philadelphia, PA 19102	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Scott F. Waterman Chapter 13 Trustee 2901 St. Lawrence Avenue Suite 100 Reading, PA 19606	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
United States Trustee Office of the U.S. Trustee Robert N.C. Nix Federal Building 900 Market Street Suite 320 Philadelphia, PA 19107	U.S Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

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